

1 TREY JONES (SBN: 237607)
2 **LAW OFFICES OF H.W. TREY JONES**
3 680 South Santa Fe Avenue
4 Los Angeles, CA 90021
5 Telephone: (310) 575-9955
6 Facsimile: (310) 575-9919

7 Attorney for Plaintiffs

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 GARY FARRIS and MELVA FARRIS,
12 Plaintiffs,

13
14
15 3M COMPANY, et al.

16 Defendants.
17

Case No.: 3:18-cv-04186-JST

**STIPULATION TO CONTINUE
CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES;
[PROPOSED] ORDER**

Complaint filed: May 15, 2018

18 **WHEREAS**, Plaintiffs GARY FARRIS and MELVA FARRIS (“Plaintiffs”)
19 filed a complaint in Alameda County Superior Court alleging causes of action for
20 Strict Liability, Negligence, Fraud, Conspiracy to Defraud, and Market Share, arising
21 out of alleged exposure to asbestos, (the “Complaint”).

22 **WHEREAS**, The matter was removed from the Alameda County Superior
23 Court to the United States District Court for the Northern District of California;

24 **WHEREAS**, Plaintiff’s counsel recently discovered that many of the
25 defendants in the matter have not been served;

26 **WHEREAS**, a Case Management Conference is calendared for October 24,
27 2018 and the Parties are to meet and confer concerning a Joint Case Management
28 Statement by October 3, 2018 and file said same on October 15, 2018;

1 **WHEREAS**, the Parties request that these dates be pushed out so the Plaintiffs
2 can complete service of all defendants.

3 Based on the foregoing, **IT IS HEREBY STIPULATED**, by and between
4 Plaintiffs and the defendants who have appeared in the matter to date, CARRIER
5 CORPORATION, CRANE CO., GENERAL ELECTRIC COMPANY, IMO
6 INDUSTRIES, INC., PARKER-HANNIFIN CORPORATION, RICOH
7 COMPANY, LTD., RICOH COMPANY, LTD. and RICOH USA, INC.

8 1. That the Case Management Conference be continued to November 28,
9 2018;

10 2. That the deadline for the Parties to meet and confer concerning a Joint
11 Case Management Statement be continued to November 7, 2018;

12 3. That the deadline to file the Joint Case Management Statement be
13 continued to November 21, 2018,

14
15
16 Dated: September 26, 2018

LAW OFFICE OF H.W. TREY JONES

17 By: /s/ Trey Jones
18 TREY JONES, ESQ.
19 Attorneys for Plaintiffs
GARY FARRIS and MELVA FARRIS

20 Dated: September 26, 2018

TUCKER ELLIS LLP

21 By: /s/ Ronald Q Tran
22
23 Attorneys for
CARRIER CORPORATION

24 Dated: September 26, 2018

K&L GATES LLP

25 By: /s/ Geoffrey M Davis
26
27 Attorneys for Defendant
28 CRANE CO.

1 Dated: September 26, 2018

WFBM, LLP

2 By: /s/ Charles T. Sheldon

3 Attorneys for Defendant
4 GENERAL ELECTRIC
5 COMPANY

6 Dated: September 26, 2018

LEADER & BERKON LLP

7 By: /s/ Bobbie Rae Bailey

8 Attorneys for Defendant
9 IMO INDUSTRIES, INC.

10 Dated: September 26, 2018

DUANE MORRIS LLP

11 By: /s/ Christopher Sean Patterson

12 Attorneys for Defendant
13 PARKER-HANNIFIN
14 CORPORATION

15 Dated: September 26, 2018

16 MANNING GROSS +
17 MASSENBURG LLP

18 By: /s/ Mary Katherine Back

19 Attorneys for Defendants
20 RICOH COMPANY, LTD. and
21 RICOH USA, INC.

ORDER

Based upon the foregoing stipulation by the parties, the Court hereby orders that:

1. That the Case Management Conference be continued to ~~November 28,~~
2018; For good cause shown.
2. That the deadline for the Parties to meet and confer concerning a Joint Case Management Statement be continued to November 7, 2018;
3. That the deadline to file the Joint Case Management Statement be continued to November 21, 2018,

IT IS SO ORDERED.

Dated: October 2, 2018



HON. J. S. TIGAR
United States District Court Judge